

United States District Court  
Southern District of New York

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

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**DECLARATION OF SIGRID S. McCawley IN SUR-REPLY IN RESPONSE TO  
DEFENDANT'S REPLY IN SUPPORT OF MOTION FOR SANCTIONS**

I, Sigrid S. McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am a partner with the law firm of Boies, Schiller & Flexner LLP and duly licensed to practice in Florida and before this Court pursuant to this Court's September 29, 2015 Order granting my Application to Appear Pro Hac Vice.

2. I respectfully submit this Declaration in response to Defendant's Reply in Support of Motion for Sanctions.

3. Attached hereto as Sealed Exhibit 1, is a true and correct copy of Dr. Christopher Donahue Medical Records.

4. Attached hereto as Sealed Exhibit 2 is a true and correct copy of Excerpts from the May 26, 2016 Deposition of Dr. Steven W. Olson.

5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of Defendant's Supplemental Memorandum of Law in Response to Plaintiff's Motion to Compel Production of Documents Subject to Improper Objections.

6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of January 14, 2016 Hearing Transcript.

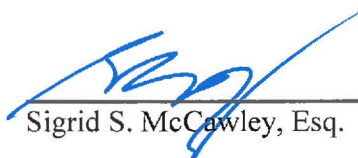
7. Attached hereto as Sealed Exhibit 5 is a true and correct copy of Defendant's Response to Plaintiff's First Set of Interrogatories.

8. Attached hereto as Sealed Exhibit 6 is a true and correct copy of Dr. Hayek Medical Records. (Giuffre007567-007576)

9. Attached hereto as Sealed Exhibit 7 is a true and correct copy of Correspondence from Dr. Judith Lightfoot. (Giuffre006636)

10. Attached hereto as Sealed Exhibit 8 is a true and correct copy of Excerpts from the May 3, 2016 Deposition of Virginia Giuffre.

I declare under penalty of perjury that the foregoing is true and correct.



Sigrid S. McCawley, Esq.

Dated: July 12, 2016.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: 

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<sup>1</sup> This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on the 12th day of July, 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

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Sigrid S. McCawley